

June 29, 2009
via electronic filing

Ms. Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: SEIU COPE Amended 30 Day Post-General Report (10/16/08-11/24/08), received 12/22/08

Dear Ms. Lewis:

This is in response to your letter to SEIU COPE, dated May 29, 2009. In your letter, you ask six questions regarding the above referenced Report.

- 1) The receipt of funds from our connected organization was an error made when transferring funds between money market and checking accounts at the bank where both the SEIU and SEIU COPE accounts are maintained. When the error was discovered, the money was refunded and transferred back to the proper account of the connected organization. A copy of the bank statement showing the return will be submitted via paper copy. That transaction, which occurred on December 18 will be reflected on the amended Year End report.
- 2) The amended report includes disbursements that were inadvertently omitted from the original report when software problems occurred as the deadline for filing approached. 95% of the additional disbursements included in the amended report involved other disbursements un-related to any federal election and included on Line 29.
- 3) We are filing another amended Post-General report that will itemize and clarify the expenditures for the activity reported on the 24 hr notices that you inquired about.
- 4) The amended report we will be filing will modify the expenditures described as "canvass staff & expenses" to clarify that they were payments for "door-to-door voter ID and get out the vote efforts". The expenditure described as "canvass materials" will be clarified to reflect it was for "printed materials and design for door to door get out the vote efforts."
- 5) The amended Post-General report we are filing will itemize and clarify the expenditures that correlate to the activity reported on the 24 hr notices.
- 6) The expenditures in this report that were described as for "background research and polling," were not for communications containing express advocacy. They were made for general research and advice on communications and voter attitudes and thus were correctly included on the report Line 21. The expenditures in this report that were described as for "production for web video," "video production" and "DVD production" were not for communications containing express advocacy. They were made for use on the internet or stock footage that might be used in future communications to SEIU members and/or the general public but were not part of any specific independent expenditures being made and thus were correctly included on the report Line 21. The expenditure in this report that was described as for "newswire service" was for distribution of a press release and did not constitute a "public communication" under the Commission's regulations and was correctly included on the report Line 21.

Please feel free to contact me if you have any further questions.
